

**IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN DISTRICT
OF GEORGIA ATLANTA DIVISION**

NEW GEORGIA PROJECT, et al.,
Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

No. 1:24-cv-03412-SDG

No. 1:24-cv-04287-SDG

No. 1:24-cv-04659-SDG

GEORGIA STATE CONFERENCE OF
THE NAACP, et al.,
Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

SECURE FAMILIES INITIATIVE
AND THEIR MEMBERS,
Plaintiff,

v.

BRAD RAFFENSPERGER, et al.,
Defendants.

**UNOPPOSED *NUNC PRO TUNC* MOTION FOR LEAVE FOR
EXTENSION OF TIME TO FILE CONSOLIDATED RESPONSE TO
MOTIONS TO DISMISS**

Plaintiffs New Georgia Project, Sang Huynh, Georgia Muslim Voter Project, A. Philip Randolph Institute, Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., VoteRiders, and Secure Families Initiative respectfully request a one-day extension of time to file their consolidated response to various Rule 12(b) motions (ECF Nos. 168-171, 173, 174, 176) from February 21, 2025 to February 22, 2025, *nunc pro tunc*.

In support of this motion, Plaintiffs state as follows:

1. Under the Court's February 11, 2025 order (ECF No. 186), Plaintiffs' consolidated response brief was due February 21, 2025.
2. Due to the logistical effort coordinating a consolidated brief and last-minute technological issues with finalizing and uploading the 95-page brief, the consolidated opposition (ECF No. 228) was filed a few minutes after midnight, on February 22, 2025.
3. Plaintiffs regret the late filing.
4. Given that the opposition was filed several minutes late at the start of a weekend and in a non-emergency situation, Plaintiffs do not believe there is material prejudice to other parties.
5. Plaintiffs are willing to consent to an extension of Defendants' time to file their reply briefs from their current deadline of March 7, 2025.

6. On February 22, 2024, Plaintiffs' counsel contacted counsel for the Defendants and Intervenors regarding this motion. Defendants and Intervenors do not oppose this motion.

Respectfully submitted this 24th day of February, 2025,

Caitlin May (Ga. Bar No. 602081)
Cory Isaacson (Ga. Bar No. 983797)
Akiva Freidlin (Ga. Bar No. 692290)
**ACLU FOUNDATION OF
GEORGIA, INC.**
P.O. Box 570738
Atlanta, Georgia 30357
(678) 310-3699
cisaacson@acluga.org
cmay@acluga.org
afreidlin@acluga.org

Julie M. Houk*
**Lawyers' Committee for Civil Rights
Under Law**
1500 K Street NW, Suite 900
Washington, DC 20005
Telephone: (202) 662-8600
General Fax: (202) 783-0857
jhouk@lawyerscommittee.org
drollins-boyd@lawyerscommittee.org
rsnow@lawyerscommittee.org
sheyward@lawyerscommittee.org
jlewis@lawyerscommittee.org

Neil A. Steiner*
Mara Cusker Gonzalez*
Biaunca S. Morris*
Dechert LLP

/s/ John A. Freedman
John A. Freedman*
Jeremy Karpatkin*
Rachel L. Forman*
**ARNOLD & PORTER KAYE
SCHOLER LLP**
601 Massachusetts Ave. N.W.
Washington, DC 20001
(202) 942-5000
john.freedman@arnoldporter.com
jeremy.karpatkin@arnoldporter.com
rachel.forman@arnoldporter.com

Michael A. Rogoff*
**ARNOLD & PORTER KAYE
SCHOLER LLP**
250 West 55th Street
New York, NY 10019
(212) 836-8000
michael.rogoff@arnoldporter.com

John Powers*
Hani Mirza*
Matthew A. Fogelson*
ADVANCEMENT PROJECT
1220 L Street Northwest, Suite 850
Washington, DC 20005
(415) 238-0633
jpowers@advancementproject.org
hmirza@advancementproject.org

Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Facsimile: (212) 698-3599
Neil.steiner@dechert.com
Mara.cuskergonzalez@dechert.com
Biaunca.morris@dechert.com

Lindsey B. Cohan*
Dechert LLP
515 Congress Ave. STE 1400
Austin, TX 78701
Telephone: (512) 394-3000
Facsimile: (512) 394-3001
Lindsey.cohan@dechert.com

**Admitted Pro Hac Vice*

*Attorneys for Plaintiffs Georgia State
Conference of the NAACP, Georgia
Coalition for the People's Agenda,
and VoteRiders*

mfogelson@advancementproject.org

Bryan L. Sells
Georgia Bar No. 635562
**THE LAW OFFICE OF BRYAN L.
SELLS, LLC**
P.O. Box 5493
Atlanta, GA 31107
Tel: (404) 480-4212
bryan@bryansellsllaw.com

**Admitted Pro Hac Vice*

*Counsel for Plaintiffs New Georgia
Project, Sang Huynh, Georgia
Muslim Voter Project, and A. Philip
Randolph Institute*

Katherine L. D'Ambrosio (Ga. Bar
No. 780128)
Jennifer Virostko (Ga. Bar No.
959286)
Ben Watson (Ga. Bar No. 632663)
**COUNCILL, GUNNEMANN &
CHALLY LLC**
75 14th Street, NE, Suite 2475
Atlanta, GA 30309
(404) 407-5250
kdambrosio@cgc-law.com
jvirostko@cgc-law.com
bwatson@cgc-law.com

Alice Huling*
Danielle Lang*
Valencia Richardson*
Daniel S. Lenz*
Rachel Appel*
Lucas Della Ventura*
CAMPAIGN LEGAL CENTER

1101 14th St. NW, Ste. 400
Washington, D.C. 20005
Tel: (202) 736-2200
Fax: (202) 736-2222
ahuling@campaignlegalcenter.org
dlang@campaignlegalcenter.org
vrichardson@campaignlegalcenter.org
dlenz@campaignlegalcenter.org
rappel@campaignlegalcenter.org
ldellaventura@campaignlegalcenter.org

**Admitted Pro Hac Vice*

*Counsel for Plaintiff Secure Families
Initiative*

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2025, I electronically filed the foregoing UNOPPOSED *NUNC PRO TUNC* MOTION FOR LEAVE FOR EXTENSION OF TIME TO FILE CONSOLIDATED RESPONSE TO MOTIONS TO DISMISS with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record in this matter.

/s/ John A. Freedman

John A. Freedman

**ARNOLD & PORTER KAYE
SCHOLER LLP**

601 Massachusetts Ave. N.W.

Washington, DC 20001

(202) 942-5000

john.freedman@arnoldporter.com